

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:13-CR-481-P

v.

THEODORE OKECHUKU (01)

EMMANUEL IWUOHA (03)

JERRY REED (06)

KELVIN RUTLEDGE (07)

GOVERNMENT'S CONSOLIDATED RESPONSE TO  
DEFENDANTS' MISCELLANEOUS MOTIONS

The defendants filed a number of miscellaneous pretrial motions, many that are similar in nature. The government consolidates its response as follows:

**I. Motion to Allow Filing of Additional Pretrial Motions**

Defendant, Jerry Reed, filed a motion requesting that the Court allow the defendant the ability to file additional pretrial motions if necessary. (Documents 180 and 181.) The government has no objections.

**II. Motion to Adopt Coconspirators' Motions**

Defendants Emmanuel Iwuoha and Jerry Reed filed similar motions asking to adopt pretrial motions filed on behalf of coconspirators. (Document 190, Iwuoha; Document 184, Reed.) The government has no objections.

**III. Motion for Ruling on Motions**

Defendant Theodore Okechuku filed a motion asking this Court rule on previously filed pretrial motions. (Document 186.) The government has no objections and defers to the Court.

**IV. Motion to Examine Prospective Jurors**

Defendant Jerry Reed requests time to allow counsel to question prospective jurors during voir dire. (Document 185.) The government has no objection and defers to the Court.

**V. Request for 404(b) Notice**

Defendants Jerry Reed and Kelvin Rutledge filed motions requesting notice of extraneous acts under Federal Rules of Evidence 404(b). (Document 183, Reed; Document 179, Rutledge.) Notice of intrinsic evidence to the offense conduct has already been provided through discovery. The government will provide formal notice of evidence under FRE 404(b), if any exists, in a reasonable time prior to trial.

JOHN R. PARKER  
UNITED STATES ATTORNEY

/s/ Katherine E. Pfeifle  
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**CERTIFICATE OF SERVICE**

I certify that on August 31, 2015, I served a true and correct copy via ECF to defense counsel of record: Victor Vital and Nick Sarokhanian; Bruce Kaye; Brady Wyatt; and Jens Bakker.

/s/ Katherine E. Pfeifle  
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KATHERINE E. PFEIFLE